

1 Q. Did you ultimately go to the place where Mr. Karam
2 and Mr. Enfield asked you to come?

3 A. Yes.

4 Q. Where was that?

5 A. State building in Albany.

6 Q. Do you remember which one?

7 A. The one in the middle.

8 Q. Okay. In the plaza; correct?

9 A. Yeah.

10 Q. Was it the Justice Building, do you remember that
11 being the case, or no?

12 A. I don't know what building.

13 Q. Did you go to an office where the New York State
14 Attorney General is located?

15 A. Yes.

16 Q. Did you ever speak to a woman named Jennifer
17 Sommers while at that building?

18 A. Yes.

19 Q. Okay. Was she present when you gave your
20 statement?

21 A. Yes.

22 Q. Okay. Did she give you any information that
23 appears in the statement, which is marked as
24 Exhibit 5?

1 A. This is what?

2 Q. Did she provide you with any information that
3 ultimately made its way into the Exhibit 5?

4 A. No.

5 Q. Okay. Did anyone give you information that was
6 then included in Exhibit 5?

7 A. No.

8 Q. Are all the words included in Exhibit 5 your words
9 and no one else's?

10 A. Correct.

11 Q. Okay. Can you explain to me how you went down
12 there on May 5th and gave this statement? You
13 drove down by yourself?

14 A. Correct.

15 Q. And was Mr. Hannigan with you?

16 A. Yes.

17 Q. Was anybody else there?

18 A. Yes.

19 Q. Who else was there?

20 A. Two investigators.

21 Q. Other than Karam and Enfield?

22 A. Yes.

23 Q. So it was Karam, Enfield, Jen Sommers,
24 Mr. Hannigan, you, and who else?

1 A. I don't know who else, the guy's name.

2 Q. Did you get their card?

3 A. Out of New York. I don't know which guys.

4 Q. Okay. Do you have their cards though?

5 A. This is the people I talked to.

6 Q. You talked to them about what?

7 A. That were involved in this. They brought their
8 electronic guys or IT guys to get the video off my
9 phone.

10 Q. Just for the record, we are going to make a copy of
11 those cards just to clear everything up. You
12 handed me a card for a Paul Clyne, whose card reads
13 that he is the Deputy Chief Special Investigations
14 and Prosecutions Unit of the New York State Office
15 of the Attorney General. And you gave me a card
16 for a Mitchell Paurowski, P-A-U-R-O-W-S-K-I. His
17 card reads he is an investigator in the
18 Investigations Division. Then you gave me a card
19 for a Nicholas Viorst, V-I-O-R-S-T. His card reads
20 Deputy Chief Special Investigations and
21 Prosecutions Unit, New York State Attorney
22 General's Office. His business address is New York
23 City. Mr. Paurowski's address is the capital in
24 Albany. Mr. Clyne's address is the capital in